

# **EXHIBIT G**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

PENN ENGINEERING &  
MANUFACTURING CORP., and  
PEM MANAGEMENT, INC.,  
  
Plaintiffs,  
  
v.  
  
PENINSULA COMPONENTS, INC.,  
  
Defendant.

Case No. C07 04231 CRB


**PLAINTIFFS' RESPONSES TO  
DEFENDANT'S FIRST SET OF  
INTERROGATORIES**

1 01094. Pursuant to Rule 33(d), PEM will produce examples of these materials in discovery.  
2 PEM will identify those documents by Bates number when they are produced.  
3

4 **Interrogatory No. 17:** For any of Defendant's First Request for Admissions that  
5 Plaintiffs do not make an unqualified admission, state the basis of such denial or partial denial,  
6 and all facts supporting such basis.  
7

8 **Response to Interrogatory No. 17:** PEM objects to this Interrogatory on the grounds  
9 that it is overly broad and unduly burdensome. PEM further objects to this Interrogatory as  
10 premature since discovery in this matter is ongoing and all facts which support PEM's claims  
11 against Pencom may not be known to PEM at this time. PEM reserves the right to supplement or  
12 amend this response. PEM further objects to this Interrogatory to the extent it seeks information  
13 protected by the attorney-client privilege, the work product doctrine, any statute, rule or  
14 regulation that provides for confidentiality, or that are otherwise protected from discovery. PEM  
15 will limit its response to provide information not otherwise privileged. PEM also objects to the  
16 Interrogatory as it seeks trade secrets, or non-public, confidential, research, development, or  
17 commercial information. PEM will provide such information subject to the terms of the  
18 Protective Order executed by the parties. PEM further responds that Pencom's requests for the  
19 basis of PEM's denial or partial denial of requests for admission, and all facts supporting such  
20 basis, are effectively contention interrogatories, and are premature at this stage of the litigation.  
21 Subject to PEM's general and specific objections, PEM states that its responses to the  
22 Admissions speak for themselves.  
23

24 **Interrogatory No. 18:** Identify any summaries, compilations, analyses, or other  
25 documents, prepared regarding potential damages, including lost profits and reasonable royalties,  
26 and state whether such documents were prepared "prior to" or "after" receiving sales information  
27 from defendant in late 2007.  
28



1  
2       **Response to Interrogatory No. 18:** PEM objects to this Interrogatory on the grounds  
3 that it is overly broad and unduly burdensome. PEM further objects to this Interrogatory as  
4 premature since discovery in this matter is ongoing and all facts which support PEM's claims  
5 against Pencom may not be known to PEM at this time. PEM reserves the right to supplement or  
6 amend this response. PEM further objects to this Interrogatory as vague with respect to the term  
7 "late 2007." PEM further objects to this Interrogatory to the extent it seeks documents protected  
8 by the attorney-client privilege, the work-product doctrine, any statute, rule or regulation that  
9 provides for confidentiality, or that are otherwise protected from discovery. PEM objects to this  
10 Interrogatory on the ground that any analyses created in anticipation of litigation are protected  
11 work product, which PEM will not produce.  
12

13       **Interrogatory No. 19:** Identify all documents responsive to any of the foregoing  
14 interrogatories that are lost or unavailable and identify the date the loss or unavailability was first  
15 discovered, the person(s) who discovered such loss or unavailability, and the person(s) most  
16 knowledgeable regarding the contents of such lost or unavailable documents.  
17

18       **Response to Interrogatory No. 19:** PEM objects to this Interrogatory on the grounds  
19 that it is overly broad and unduly burdensome. PEM further objects to this Interrogatory as  
20 premature since discovery in this matter is ongoing and all facts which support PEM's claims  
21 against Pencom may not be known to PEM at this time. PEM reserves the right to supplement or  
22 amend this response. Subject to and without waiving PEM's specific and general objections,  
23 PEM responds that it is unaware of any such documents other than those identified in these  
24 responses.  
25

26       **Interrogatory No. 20:** Identify all persons who participated in any way in the  
27 preparation of answers to these interrogatories, and state specifically with regard to each  
28